



**State of New Hampshire  
DEPARTMENT OF ENVIRONMENTAL SERVICES**

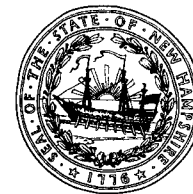
**Winnepesaukee River Basin Program**

Wastewater Treatment Plant

P.O. Box 68 • Franklin, NH • 03235

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FAX 603-934-4831



**NOTICE OF PAST VIOLATION**

August 21, 2006

Mr. Kirk Beswick  
Smiths Tubular Systems  
93 Lexington Drive  
P.O. Box 678  
Laconia, New Hampshire 03247-0678

CERTIFIED MAIL  
7002 2030 0000 1006 1727

Subject: IDP 0001: Smiths Tubular Systems, Laconia, N.H.

Dear Mr. Beswick:

On August 8, 2006, personnel from the Winnepesaukee River Basin Program (WRBP), Water Division ("the Division") conducted a review of your 2<sup>nd</sup> quarter report for the facility located at 93 Lexington Drive in Laconia, N.H. The purpose of the review was to determine compliance with Industrial Discharge Permit (IDP) #0001 and 40 CFR 403 and applicable requirements there from. During the review the following deficiencies were noted:

- (1) Smiths Tubular Systems (STS) sampled on April 12, 2006 for parameters required by the IDP in the 2<sup>nd</sup> Quarter (April 1, 2006 through June 30, 2006) of the 2006 monitoring period. STS claimed in its certification statement that its waste was in compliance for the second quarter of 2006; however this is not entirely correct. The company had not tested for Copper, Nickel or Zinc as is required by the IDP.
- (2) In section IV REPORTING AND MONITORING of the IDP (para: g.6), there is a requirement to record the date the analytical results were received and since there is not a "Received" stamp date on your analytical laboratory report, it is assumed you were in possession of the report shortly after it was signed by the Eastern Analytical Lab Director on 04/28/06. With almost two months left in the 2<sup>nd</sup> quarter there was sufficient time to resample and analyze for the three missing metals if the error had been detected when the laboratory report was received.

The above deficiencies were discussed with you on August 9, 2006 when WRBP personnel were conducting 3<sup>rd</sup> quarter compliance sampling at your facility. Your method of having a designated person check the results against the permit requirements appears to be workable and it is unfortunate that the employee, who no longer works at your facility, signed off on the check with

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- CONCORD OFFICE -

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the permit requirements did not do a more thorough job. This may have been the reason for the error, however that does not relieve STS from complying with the IDP. The Division believes that the cited deficiencies can be prevented from reoccurring. Through this notice of past violation, the Division is documenting that the violations occurred and will be addressed by STS. WRBP personnel will continue to conduct regular follow-up reviews to ensure that you are maintaining full compliance with IDP #0001.

Should you have any questions regarding this letter, please contact Vernon Chris Hipkiss at 934-2809.

Very truly yours,

  
Richard Flanders, Director  
Winnepesaukee River Basin Bureau

CERTIFIED MAIL

cc: Steven Dolloff, Superintendent, WRBP  
Vernon Chris Hipkiss, Ind. Pretreatment Coordinator, WRBP  
Gretchen Hamel, Enforcement Coordinator, DES  
Director of Public Works, City of Laconia  
City Clerk, City of Laconia  
WRBP File